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From: Schaffer,Carolyn A [CSchaffer@mwdh2o.com]
Sent: Monday, June 07, 2010 3:23 PM
To: Water Use Efficiency
Cc: Blair,Tim
Subject: Comment letter on SBX7-7 Draft Urban Technical Methodologies
Attachments: Comments on Draft Urban Technical Methodologies 06-07-2010.pdf

<<Comments on Draft Urban Technical Methodologies 06-07-2010.pdf>>

Attached is the Metropolitan Water District's comment letter on the draft urban technical methodologies for SBX7-7. We appreciate the opportunity to provide input and look forward to further discussions at the Urban Stakeholder Committee meeting on June 22nd.

Sincerely,

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

June 7, 2010

Mr. Manucher Alemi, Ph.D., P.E.
Chief, Water Use and Efficiency Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Alemi:

Comments on SBX7-7 Draft Urban Technical Methodologies

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the draft urban technical methodologies for implementation of SBX7-7. We support the Department of Water Resources' (Department) approach to developing these methodologies, using Department resources in conjunction with the expertise of the California Urban Water Conservation Council and Urban Stakeholder Committee. Metropolitan offers the following comments on the draft methodologies; suggested word changes or additions are shown in *underlined italics*.

Methodology 1: Gross Water Use

- Section 10608.12(m) of SBX7-7 defines recycled water that may be excluded from gross water use, identifying specific treatment and delivery requirements. This definition is important and should be included in Methodology 1.
- Step 6 in the draft methodology addresses change in distribution system storage by requiring water suppliers to calculate the change in storage "for each storage tank and reservoir within the distribution system". Water suppliers should have the option of excluding storage facilities within their distribution system that are primarily used to balance system pressure or time of day demand fluctuations rather than provide long-term storage. Many systems may have dozens of these facilities and may not maintain records for the calculations proposed by the Department.
- Step 8 in the draft methodology addresses the deduction for recycled water used for indirect potable reuse. To ensure consistency with SBX7-7, the following should be added: "This step is necessary only if the urban retail water supplier conjunctively uses recycled water *(as defined in Section 10608.12(m) of SBX7-7)* with raw surface or groundwater for indirect potable reuse."
- The water system schematic shown in Figure 1 should be identified as an example; systems may have other components not represented in the depiction.

Methodology 2: Service Area Population

- In addition to the approaches described in the draft methodology, any substantiated method should be allowable provided that (1) it meets the requirements for an Urban Water Management Plan per Water Code Section 10631(a) and (2) it is used for calculating both base daily per capita water use and compliance daily per capita water use. The approach proposed in the draft methodology may result in greater accuracy for population estimates; however, it will likely increase the administrative cost for reporting. Many agencies have invested in developing population estimating models for their urban water management plans; these tools should be acceptable under SBX7-7. Use of a consistent methodology during the base period and compliance years is more important than highly accurate population estimates.

Methodology 3: Base Daily Per Capita Water Use

- This methodology should address the minimum 5 percent reduction in daily per capita water use required in Section 10608.22 of SBX7-7. The instructions should clarify that water suppliers are to calculate (1) the base daily per capita water use for a 10 or 15-year base period as described in Section 10608.20, and (2) the base daily per capita use for a 5-year period as described in Section 10608.22. Information should be provided on how to set the 2020 target based on the lower GPCD target of either the chosen compliance method or the 5 percent minimum reduction.
- Figure 1 should be corrected to accurately state the provision in Section 10608.22: "Section 10608.20 Base Daily Per Capita Water Use *equal to or* less than 100 GPCD"
- Water suppliers should have the option of using an alternative methodology as follows:
    1. Sum annual gross water use over the base period
    2. Sum year-end population for each of the base period years
    3. Divide summed water use by summed population
    4. Divide result by 365

Methodology 4: Compliance Daily Per Capita Water Use

- The draft methodology allows for two optional adjustments when the distribution area contracts in size. This condition may significantly affect GPCD; therefore these adjustments should not be optional. The following changes are suggested:
    1. If during the baseline years a previously served portion exits a water supplier's service area, the baseline GPCD ~~may~~ *shall* be corrected to reflect only that portion of the service area that remained consistently supplied during the baseline and compliance years.
    2. If a previously supplied portion *included in the baseline* exits the distribution area ~~during the baseline and~~ *prior to* the compliance years, water suppliers ~~can~~ *shall* recompute their baseline GPCD after eliminating the exited portion for all the baseline years.

Methodology 5: Residential Indoor Use

- The methodology should acknowledge that the ability to change the indoor performance standard leads to uncertainty for water suppliers choosing this method. The Department should observe caution in any future recommendation to change the performance standard.

Methodology 6: Landscape Area Water Use

- The methodology should allow for maximum flexibility in choosing the technology and approach for estimating irrigated landscape area, including data collection, analysis and reporting. It should not require that estimates be calculated on a parcel by parcel basis. However, any approach chosen by a water supplier must exclude undeveloped land as this land should not receive a water budget. It should also exclude areas irrigated through non-dedicated commercial meters as this water use is addressed in the CII performance standard.
- The draft methodology describes an approach to estimate landscaped area as a percentage of total land use. As written, this approach could be used to sample parcels up to 24,000 square feet with the percentage of landscaped area estimated using increments of 1/6 of parcel size. An example would help clarify this approach.

Methodology 8: Criteria for Compliance Year Adjustments

- Section 10608.24(d) of SBX7-7 allows water suppliers the option of using compliance year adjustments but does not require it. Under "Evapotranspiration and Rainfall", the third paragraph (top of page 8-2) should be changed to indicate this is voluntary:
  - "Water suppliers choosing Method 2 to set their water use target ~~can~~ *may* test compliance by comparing actual usage in the compliance years….."
- A water supplier should be allowed to use the adjustment for "substantial changes to commercial or industrial water use resulting from increased business output and economic development" if doing so allows a non-compliant water supplier to become compliant. A substantial increase in business output and economic development is a relative (not absolute) measure, and the most pertinent measure of "substantial" under the law is whether the increased output and development affect compliance. The following language is suggested:
  - "If GPCD still exceeds the target ~~by a substantial amount (>3%)~~ after being adjusted for evapotranspiration and rainfall ~~compliance~~, water suppliers ~~can~~ *may* examine whether the discrepancy is being caused by substantial growth in business output by using of the following two methods:"
- The two methods proposed for evaluating the effect of business growth assume that water suppliers have excluded process water use. This exclusion is optional; therefore, process water that is included in gross water use should be included in this evaluation.

I appreciate the Department's collaboration with the California Urban Water Conservation Council and the opportunity to participate on the Urban Stakeholder Committee. We acknowledge the Department's significant effort to meet the October 2010 deadline for adoption of these methodologies.

Again, thank you for the opportunity to provide comments. If you have any questions, please feel free to contact me at (213) 217-6613 or via email tblair@mwdh2o.com.

Very truly yours,

Timothy A. Blair
Program Manager

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